

From: [Lydia Johnson](#)
To: [Barbara Aldridge](#)
Subject: Fw: Gulfco: Follow Up on Friday Telephone Inquiry on Unilateral Administrative Order for Remedial Investigation / Feasibility Study (UAO for RI/FS)
Date: 05/19/2009 03:12 PM
Attachments: [Gulfco Removal AOC Draft2.doc](#)

fyi

----- Forwarded by Lydia Johnson/R6/USEPA/US on 05/19/2009 03:13 PM -----

Fw: Gulfco: Follow Up on Friday Telephone Inquiry on Unilateral Administrative Order for Remedial Investigation / Feasibility Study (UAO for RI/FS)

Mark to: TMariani
Peycke

05/19/2009
01:55 PM

Cc: nann.barbara, Wren Stenger, Lydia Johnson

Tom - Sam has decided to try this one more time in the hope of getting a construction completion. I will not be here next week for our monthly call to discuss this, but Wren and Lydia should be. I will be at the DD meeting in Philadelphia. Any help you may be able to provide will be appreciated.

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Mark Peycke, Chief
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
214.665.2135

----- Forwarded by Mark Peycke/R6/USEPA/US on 05/19/2009 01:31 PM -----

Fw: Gulfco: Follow Up on Friday Telephone Inquiry on Unilateral Administrative Order for Remedial Investigation / Feasibility Study (UAO for RI/FS)

Barbara to: Peycke.Mark
Nann

05/19/2009
10:17 AM

Mark,

Can you forward to Tom the programs request to contact the Gulfco PRP group with the last draft of the AOC for Removal? EPA program wants to approach the PRP group one last time to see if they are interested in signing the AOC for Removal that EPA gave them late last year (Tom's January 19, 2009 letter references the issues that could not be resolved on the draft removal AOC). I am also attaching the latest draft.

----- Forwarded by Barbara Nann/R6/USEPA/US on 05/19/2009 10:10 AM -----

Gulfco: Follow Up on Friday Telephone Inquiry on Unilateral Administrative Order for Remedial Investigation / Feasibility Study (UAO for RI/FS)

**Mariani, Tom
(ENRD)**

to: James.Morriss

02/04/2009 01:24 PM

Cc:

Elizabeth.Webb, Garyg Miller, Barbara Nann

Thanks for your call last Friday, asking whether the extant UAO for RI/FS is a vehicle available for handling tank removal at the Gulfco Marine Site. In our telephone call, you correctly noted that my earlier letter to you did not provide for that option. I've now double checked with EPA (legal and program sides); my earlier letter stands as is.

The extant UAO does include provision for emergency activities, including the idea of site security that you mentioned. EPA is of course always concerned about these kinds of issues,

especially if
changing circumstances warrant action. Here, at least at this
time,
EPA does not see conditions that would warrant invocation of
that UAO to
do this work. As you may recall, some of those UAO
provisions have
been invoked at this Site to address other problems, but not
all work
activities can be covered by this UAO.

As noted in my earlier letter to you, the previously-
proposed of an
Administrative Order on Consent (AOC) remains on the table for
the tanks,
in the form described by my letter.



Thanks. TM Gulfco Removal AOC Draft2.doc